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# AGRI-BUSINESS COUNCIL OF ARIZONA, INC.

*Arizona's Reclamation Representative to the National Water Resources Association*

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August 15, 2012

The Honorable Steven Chu, Secretary  
Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

Dear Secretary Chu:

On behalf of the membership of the Agri-Business Council of Arizona or ABC (membership focused on water, agribusiness and power issues in Arizona), we are grateful for the opportunity to provide brief comments relating to your memo of March 16, 2012 and other communications stating your agency's desires to redirect the work of Power Marketing Administrations (PMAs).

To be frank, we feel that directing Western Area Power Administration (WAPA) to participate in an Energy Imbalance Market (EIM) will negatively impact our agricultural interests and other customers in Arizona and beyond. For a region that produces agricultural commodities year round for our country's food supply and lending in large part to our national security, we encourage you to weigh the costs and benefits associated with this redirection effort and truly listen to those you will impact. Do not allow "knee jerk" decisions relating to outages dictate the direction this is going and what negative impacts will burden power users in this region.

The current process works very well; beneficiaries pay; the process is locally driven, well coordinated among interests and is sustainable, affordable, efficient, transparent and reliable. We feel redirecting the mission and authority of the PMAs will create the opposite in an effort to subsidize other's benefits.

We encourage consensus seeking, real listening to those who will likely be impacted by your decisions. They want to provide the prescription that works.

Do not simply fulfill requirements set forth in statute and regulation, namely this comment period. It should be a time to truly listen to those with a vested interest, trying to redress a grievance with the Department of Energy.

Respectfully,



Chris Udall  
Executive Director

Cc: Janice Brewer, Governor, State of Arizona  
ABC Executive Committee  
Arizona Congressional Delegation